

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA *ex rel.*
JEFFREY H. LIEBMAN and DAVID M.
STERN, M.D.,

Plaintiff-Relators,

v.

METHODIST LE BONHEUR HEALTHCARE
and METHODIST HEALTHCARE-MEMPHIS
HOSPITALS,

Defendants.

Case No.: 3:17-cv-00902

JUDGE CAMPBELL
MAGISTRATE JUDGE HOLMES

DECLARATION OF MICHAEL C. DOUGHERTY

I, Michael C. Dougherty, declare under penalty of perjury that the following statements are true and correct:

1. My name is Michael C. Dougherty. I am over 21 years of age, and I am competent to make this declaration. My statements in this declaration are based on information personally known to me or conveyed to me by the Office of Counsel to the Inspector General (OCIG) of the United States Department of Health and Human Services (HHS). I am the Office 365 Lead Engineer for the HHS Office of Inspector General. I have been in this position since March 27, 2022. Before this, I was supporting in a similar service area as a contractor starting around August of 2020.

2. On June 8, 2023, I was asked to run a search of the search terms from Exhibit A on the email accounts of Lewis Morris, Greg Demske, Martha Talley, Jennifer Michael/Williams, Kevin Barry, Karen Glassman, and Keisha Thompson for the time-period from January 1, 2011, through December 31, 2018. This search resulted in 93,801 items.

3. On May 17, 2023, a similar search of the email accounts of Lisa Re, Dan Levinson, Tamar Terzian, and Katie Arnholt returned 123,068 items. Twenty OCIG attorneys reviewed those items over 306 hours in a nine-day time-period and found no responsive documents.

Dated, this 13th day of June, 2023

MICHAEL

DOUGHERTY

Digitally signed by
MICHAEL DOUGHERTY

Date: 2023.06.13
11:30:20 -04'00'

Michael C. Dougherty

Exhibit A

(Foley NEAR(100) presentation* OR Foley NEAR(100) conference* OR Foley NEAR(100) seminar* OR Foley NEAR(100) meeting* OR Foley NEAR(100) event* OR Blau* NEAR(100) presentation* OR Blau* NEAR(100) conference* OR Blau* NEAR(100) seminar* OR Blau* NEAR(100) meeting* OR Blau* NEAR(100) event* OR "professional service* agreement*" NEAR(100) presentation* OR "professional service* agreement*" NEAR(100) conference* OR "professional service* agreement*" NEAR(100) seminar* OR "professional service* agreement*" NEAR(100) meeting* OR "professional service* agreement*" NEAR(100) event* OR "PSA" NEAR(100) presentation* OR "PSA" NEAR(100) conference* OR "PSA" NEAR(100) seminar* OR "PSA" NEAR(100) meeting* OR "PSA" NEAR(100) event* OR "co-management" NEAR(100) presentation* OR "co-management" NEAR(100) conference* OR "co-management" NEAR(100) seminar* OR "co-management" NEAR(100) meeting* OR "co-management" NEAR(100) event* OR "co management" NEAR(100) presentation* OR "co management" NEAR(100) conference* OR "co management" NEAR(100) seminar* OR "co management" NEAR(100) meeting* OR "co management" NEAR(100) event* OR "management service* agreement*" NEAR(100) presentation* OR "management service* agreement*" NEAR(100) conference* OR "management service* agreement*" NEAR(100) seminar* OR "management service* agreement*" NEAR(100) meeting* OR "management service* agreement*" NEAR(100) event* OR "MSA" NEAR(100) presentation* OR "MSA" NEAR(100) conference* OR "MSA" NEAR(100) seminar* OR "MSA" NEAR(100) meeting* OR "MSA" NEAR(100) event* OR "asset* purchase*" NEAR(100) presentation* OR "asset* purchase*" NEAR(100) conference* OR "asset* purchase*" NEAR(100) seminar* OR "asset* purchase*" NEAR(100) meeting* OR "asset* purchase*" NEAR(100) event* OR "APA" NEAR(100) presentation* OR "APA" NEAR(100) conference* OR "APA" NEAR(100) seminar* OR "APA" NEAR(100) meeting* OR "APA" NEAR(100) event* OR "provider-based" NEAR(100) presentation* OR "provider-based" NEAR(100) conference* OR "provider-based" NEAR(100) seminar* OR "provider-based" NEAR(100) meeting* OR "provider-based" NEAR(100) event* OR "provider based" NEAR(100) presentation* OR "provider based" NEAR(100) conference* OR "provider based" NEAR(100) seminar* OR "provider based" NEAR(100) meeting* OR "provider based" NEAR(100) event* OR "leas* employee*" NEAR(100) presentation* OR "leas* employee*" NEAR(100) conference* OR "leas* employee*" NEAR(100) seminar* OR "leas* employee*" NEAR(100) meeting* OR "leas* employee*" NEAR(100) event* OR "LEA" NEAR(100) presentation* OR "LEA" NEAR(100) conference* OR "LEA" NEAR(100) seminar* OR "LEA" NEAR(100) meeting* OR "LEA" NEAR(100) event* OR "physician hospital alignment" NEAR(100) presentation* OR "physician hospital alignment" NEAR(100) conference* OR "physician hospital alignment" NEAR(100) seminar* OR "physician hospital alignment" NEAR(100) meeting* OR "physician hospital alignment" NEAR(100) event* OR "physician-hospital alignment" NEAR(100) presentation* OR "physician-hospital alignment" NEAR(100) conference* OR "physician-hospital alignment" NEAR(100) seminar* OR "physician-hospital alignment" NEAR(100) meeting* OR "physician-hospital alignment" NEAR(100) event* OR "physician hospital integration" NEAR(100) presentation* OR "physician hospital integration" NEAR(100) conference* OR "physician hospital integration" NEAR(100) seminar* OR "physician hospital integration" NEAR(100) meeting* OR "physician hospital integration" NEAR(100) event* OR "physician-hospital integration" NEAR(100) presentation* OR "physician-hospital integration" NEAR(100)

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2023, a true and correct copy of the foregoing was served via email to the following:

<p>Bryan A. Vroon Law Offices of Bryan A. Vroon, LLC 1380 West Paces Ferry Road, Suite 2270 Atlanta, GA 30327 Email: bryanvroon@gmail.com</p>	<p>Edward D. Robertson, Jr. Bartimus, Frickleton & Robertson 715 Swifts Highway Jefferson City, MO 65109 Email: erobertson@bflawfirm.com</p>
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s/ Ellen Bowden McIntyre
ELLEN BOWDEN MCINTYRE
Assistant United States Attorney